PILLSBURY WINTHROP SHAW PITTMAN LLP
BRUCE A. ERICSON #76342
DAVID L. ANDERSON #149604
JACOB R. SORENSEN #209134
MARC H. AXELBAUM #209855
BRIAN J. WONG #226940
50 Fremont Street
Post Office Box 7880
San Francisco, CA 94120-7880
Telephone: (415) 983-1000
Facsimile: (415) 983-1200
Email: bruce.ericson@pillsburylaw.com

SIDLEY AUSTIN LLP
DAVID W. CARPENTER (admitted *pro hac vice*)
BRADFORD A. BERENSON (admitted *pro hac vice*)
DAVID L. LAWSON (admitted *pro hac vice*)
EDWARD R. McNICHOLAS (admitted *pro hac vice*)
1501 K Street, N.W.
Washington, D.C. 20005
Telephone: (202) 736-8010
Facsimile: (202) 736-8711

Attorneys for Defendants
AT&T CORP. and AT&T INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

TASH HEPTING, GREGORY HICKS, CAROLYN JEWEL and ERIK KNUTZEN on Behalf of Themselves and All Others Similarly Situated, Plaintiffs, vs. AT&T CORP., AT&T INC. and DOES 1-20, inclusive, Defendants.	No. C-06-0672-VRW **REPLY DECLARATION OF STARLENE MEYERKORD IN SUPPORT OF MOTION OF DEFENDANT AT&T INC. TO DISMISS PLAINTIFFS' AMENDED COMPLAINT** Date: June 23, 2006 Time: 9:30 a.m. Courtroom: 6, 17th Floor Judge: Hon. Vaughn R. Walker Filed concurrently: 1. AT&T Inc.'s Reply in Support of Motion to Dismiss 2. Reply Decl. of Joseph Tocco 3. Request for Judicial Notice

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I, **STARLENE MEYERKORD**, declare as follows:

1. My job title is Director, Office of the Senior Vice President and Secretary of AT&T Inc. I make this declaration in support of the motion of defendant **AT&T INC.** to dismiss plaintiffs' Amended Complaint for lack of jurisdiction. The facts stated herein are based upon my own personal knowledge, review of corporate business records of AT&T Inc., interviews with appropriately knowledgeable persons, or, where so indicated, upon my information and belief. If called as a witness, I could and would competently testify thereto.

2. I have reviewed a copy of Plaintiffs' Opposition to Defendant AT&T Inc.'s Motion to Dismiss Amended Complaint, which contains errors of fact regarding AT&T Inc.

3. AT&T Inc. does not provide telecommunications services, Internet services, or services of any kind to the public. Such services are provided by subsidiaries of AT&T Inc.

4. AT&T Inc. does not own or maintain a telecommunications network.

5. Neither AT&T Inc., nor its predecessor SBC Communications Inc., have ever owned, leased, operated or managed a building in the State of California.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed this 14 day of June, 2006, at San Antonio, Texas.

Starlene Meyerkord

Starlene Meyerkord